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January 31, 2020

Turner Network Sales, Inc. v. DISH Network L.L.C.  
Case No. 17-CV-7599 (S.D.N.Y.)

Dear Judge Abrams:

I represent Plaintiff/Counter-Defendant Turner Network Sales, Inc. (“Turner”) in the above-entitled action. This letter is being filed on behalf of both Turner and Defendant/Counter-Claimant DISH Network L.L.C. (“DISH” and, together with Turner, the “Parties”) to request additional time for Turner to respond to DISH’s pending letter request for leave to file a summary judgment motion. (ECF No. 141.)

On January 8, 2020, DISH requested leave to file a motion for partial summary judgment or, in the alternative, a motion for judgment on the pleadings as to Turner’s bulk billing breach of contract claim. (*Id.*) On January 10, 2020, the Court directed Turner to state its position on DISH’s request by January 24, 2020. (ECF No. 144.) On January 27, 2020, the Court granted the Parties’ request to extend Turner’s time to respond by one week to today, January 31, 2020. (ECF No. 146.)

The Parties continue to engage in discussions regarding DISH’s request for leave to file its motion and Turner’s position on DISH’s request. Accordingly, the Parties jointly request that the Court further extend Turner’s time to respond to DISH’s request by one week, until February 7, 2020. The Parties believe there is good cause to grant this request.

We are available at the Court's convenience to the extent further discussion would be helpful.

Respectfully,

A handwritten signature in blue ink, appearing to read "K. Orsini", with a long horizontal flourish extending to the right.

Kevin J. Orsini

Hon. Ronnie Abrams  
United States District Court  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

via ECF

Copies to:  
Counsel via ECF